

SBA HUBZone PIA R1

SMALL BUSINESS ADMINISTRATION
PRIVACY IMPACT ASSESSMENT

Name of Project: HUBZone Certification Tracking System (HCTS)
Program Office: Office of Government Contracting and Business Development

Once the PIA is completed and the signature approval page is signed, please provide copies of the PIA to the following:

- SBA IT Security Manager
- SBA OCIO IT Portfolio Division
- SBA Privacy Act Officer

Do not email the approved PIA directly to the Office of Management and Budget email address identified on the Exhibit 300 form. One transmission will be sent by the OCIO Portfolio Management Division

Also refer to the signature approval page at the end of this document.

A. CONTACT INFORMATION:

1) Who is the person completing this document?

Jacqueline B. West
Acting HUBZone Program Manager West Coast
Office of Government Contracting and Business Development
(202) 205-7581
Jacqueline.West@sba.gov

2) Who is the System Owner?

Mariana A. Pardo,
Acting Director for HUBZone Program
Office of Government Contracting and Business Development
202-205-2985
Mariana.Pardo@sba.gov

3) Who is the System Manager for this system or application?

Jacqueline B. West
Acting HUBZone Program Manager West Coast
Office of Government Contracting and Business Development
(202) 205-7581
Jacqueline.West@sba.gov

4) Who is the IT Security Manager who reviewed this document?

David Mccauley
Chief Information Security Officer
Office of the Chief Information Officer
202-205-7103
David.McCauley@sba.gov

5) Who is the Bureau/Office Privacy Act Officer who reviewed this document?

Ethel Matthews
Senior Advisor to Chief Privacy Officer
Office of the Chief Information Officer
202-205-7173
Ethel.Matthews@sba.gov

6) Who is the Reviewing Official? (According to OMB, this the agency IO or other agency head designee who is other than the official procuring the system or the official who conducts the PIA).

Christine Liu
Chief Information Officer /Chief Privacy Officer
Office of the Chief Information Officer
202-205-6708
Christine.Liu@sba.gov

B. PIA PROCESS APPLICATION/GENERAL INFORMATION:

1) Does this system contain any information about individuals?

a. Is this information identifiable to the individual?

Yes, based on the following pre-conditions: The online HUBZone certification system is designed to extract and auto-populate into the appropriate HUBZone application fields pre-existing data already supplied by the applicant concern and electronically available in two other Federal data collection systems, the DOD's Central Contractor Registration (CCR) and the nested SBA's Small Business Source System (SBSS). It is this DOD CCR profile, not the HUBZone application material, that is available to the general public via the Internet and the fields of information can be searched using an electronic query sheet. Where as, information (e.g. – other company officials and/or financial data) is not already available to the HUBZone application system through these two other Federal databases, the client is requested to insert this material into the appropriate HUBZone data fields. For senior company officials, this will include business telephone numbers and business e-mail addresses.

The HUBZone-specific data are retained on a secure server that is only available to HUBZone personnel based on assigned security roles and levels of pre-approved access. None of the material collected exclusively by the HUBZone system is ever available to the public for review.

We note that the subsystem, HUBZone Procurement Query and Reporting System (HPQRS) exists, however, this system does not contain any information identifiable to an individual that is unique or is not already in existence. That is, the system extracts public information from the FEDBIZOPS database (notice to the public of what the government is buying) and when a requirement is identified and found suitable for a possible HUBZone set aside, the system allows attachment of HUBZone certified firm profiles already existing in another database, the public database of the Dynamic Small Business Source System of the Central Contractor Registration (CCR/DSBSS).

b. Is the information about individual members of the public?'

Yes, within the scope of that individual's role as an owner and/or senior official with the HUBZone applicant concern. Generally, it will include name, e-mail address and ownership interests in other concerns, and whether individual has ever been debarred from Federal contracting.

c. Is the information about employees?

No

2) What is the purpose of the System?

The HUBZone application and certification (HCTS) system is a multi-level certification system that allows an interested party to apply for HUBZone status online, recertify online once every three years to continue eligibility and participate in randomly generated program examinations (formal SBA audits) that allow the Agency to confirm with documentation a firm's continuing eligibility.

3) What legal authority authorizes the purchase or development of this PIA Process?

The HUBZone Program was enacted into law as part of the Small Business Reauthorization Act of 1997 as amended. The program falls under the auspices of the U.S. Small Business Administration.

C. DATA in the PROCESS:

1) What categories of individuals are covered in the system?

As part of the HUBZone certification process, the application form contains data fields requesting identification and e-mails addresses and outside ownership interests of the business owners and senior company executives. It also asks for a point of contact within the company who can supply HUBZone application clarifications as needed.

2) What are the sources of the information in the system?

a. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, source then what other source

As previously mentioned, the source of information is twofold. The online HUBZone certification system is designed to 1) extract and 2) auto-populate into the appropriate HUBZone application fields pre-existing data already supplied by the applicant and resident in two other Federal data collection systems, the DOD's Central Contractor Registration (CCR) and the nested SBA's Small Business Source System (SBSS). Where information is not already available (e.g. – other senior company officials and a point of contact who can, as needed, clarify unclear entries in the application), the applicant is requested to insert this material into the data fields.

b. What Federal agencies are providing data for use in the process?

As noted, the Department of Defense Central Contractor Registration (CCR) system provides data, although the information is filtered through the SBA's Small Business Source System (SBSS) and delivered to the HUBZone application as part of an electronic extraction process.

c. What State and local agencies are providing data for use in the process?

None

d. From what other third party sources will data be collected?

None

e. What information will be collected from the employee and the public?

Affiliation relationships appropriate to the applicant concern and/or the owners of the applicant concern and, specific to the applicant concern, financial and employment data, as well as legal structure.

3) Accuracy, Timeliness, and Reliability

a. How will data collected from sources other than SBA records be verified for accuracy?

HUBZone certification system contains a routine, the Electronic Verification System, which has been operating since March of 2002. In essence, following the submission of an online application, the system sends to the highest ranking official identified within that applicant concern a separate electronic communication. The highest ranking senior official is asked to verify whether the individual who submitted the online application is authorized to obligate the firm to the program's requirements. That same communication also contains a listing of the consequences facing a senior official who allows misstatements to be made during the HUBZone application process and makes available to the senior official an opportunity to review immediately the entire application submission for accuracy.

b. How will data be checked for completeness?

The HUBZone application contains built-in logic functions that ensure all required data fields are filled out prior to final submission. In addition, each application is reviewed by a HUBZone analyst to verify that not only has each field been filled out correctly but that any ambiguous entries are resolved either through clarification, withdrawal by the applicant or, in the most extreme cases, the denial of HUBZone status to the applicant concern.

c. Is the Data Current? What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models)

The material extracted from the CCR/SBSS combined database must, by rule, be updated at least once every 12 months and the information inserted into the remaining HUBZone specific fields are reviewed for currency by HUBZone analysts. Certified firms are required by regulation to also recertify their continuing eligibility once every three years.

d. Are the data elements described in detail and documented? If Yes, What is the name of the document?

Data elements are described in detail and documented in the "HUBZone Certification System Data Dictionary"

D. ATTRIBUTES OF THE DATA

- 1) Is the use of the data both relevant and necessary to the purpose for which the process is being designed?**

The data is relevant and necessary to establish eligibility for HUBZone certification as stipulated in the Small Business Reauthorization Act of 1997 as amended.

- 2) Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?**

The system will not derive new data or create previously unavailable data about an individual through aggregation from the information collected.

- 3) Will the new data be placed in the individual's record?**

Not applicable, per above.

- 4) Can the system make determinations about employees/public that would not be possible without the new data?**

Not applicable, per above.

- 5) How will the new data be verified for relevance and accuracy?**

Not applicable, per above.

- 6) If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?**

The security controls to protect the information from unauthorized access or use are pursuant to the U.S. SBA Enterprise Architecture/infrastructure under which the system falls. All system protections are pursuant to the security plan/controls already in place and mandated by the SBA Enterprise Architecture. The HUBZone tracking system is a fully certified and accredited system by the SBA Office of the Chief Information Officer.

- 7) If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access through the process? Explain.**

Here again, the security controls to protect the information/data from unauthorized access or use are pursuant to the U.S. SBA Enterprise

Architecture/infrastructure under which the system falls. All system protections are pursuant to the security plan/controls already in place and mandated by the SBA Enterprise Architecture. The HUBZone tracking system is a fully certified and accredited system by the SBA Office of the Chief Information Officer.

- 8) How will the data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.**

As a matter of routine we do not retrieve data on an individual for any purpose. The clients fill out the HUBZone application seeking certification. They populate our application with information that indicates whether small business concerns are eligible and qualify for HUBZone certification or not. However, if we collect data for example based on a data collection survey, this information is reported collectively and not individually. The only circumstance where information could be reported using personal identifier information would be in the circumstance of a Freedom of Information Act request. And, in this circumstance the reporting of the information collected would be subject to Freedom of Information Act regulations and exemptions.

- 9) What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

Yet again, as a matter of routine we do not retrieve data on an individual for any purpose. The clients fill out the HUBZone application seeking certification. They populate our application with information that indicates whether their small business concern is eligible and qualifies for HUBZone certification or not. The only circumstance where information could be reported using personal identifier information would be in the circumstance of a Freedom of Information Act request. And, in this circumstance the reporting of the information collected would be subject to Freedom of Information Act regulations and exemptions.

- 10) What opportunities do individuals have to decline to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent.)**

Yet again, as a matter of routine we do not retrieve data on an individual for any purpose. The clients fill out the HUBZone application seeking certification. They populate our application with information that indicates whether they are eligible and qualify for HUBZone certification or not. The only circumstance where information could be reported using personal identifier information would be in the circumstance of a Freedom of Information Act request. And, in this circumstance the reporting of the information collected would be subject to Freedom of Information Act regulations and exemptions. Further, I believe the Freedom of Information Act process would require that if the government was about to release information to another party regarding an individual who applied

for HUBZone certification, the government would be required to seek the permission from the party whose information was being released before the information could be released. Again this process would be restricted to Freedom of Information Act rules and regulations.

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS

- 1) If the information in the process operated in more than one site, how will consistent use of the data be maintained in all sites?**

Not applicable, since the system is resident currently in only one location within SBA headquarters, in the Office of the Chief Information Officer (OCIO).

- 2) What are the retention periods of data in the system?**

There is no limit on the retention of this electronic data since the current dataset is so small and is not approaching the upper storage limits of the HUBZone servers.

In addition, firms are required to recertify their continuing eligibility each year, and each recertification is an extension of the initial application resident within the HUBZone database. The system is designed to accommodate this multi-year continuing eligibility option for several years into the future.

- 3) What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented**

Since the program only became operational in March 1999 and is still in the process of evolving the core portfolio, there is no basis upon which we can construct a reasonable retention plan. At the present time, the relatively small amount of data now in the system can be maintained within the secure environment so long as the servers remain operational. Discussions have been held, however, with SBA'S OCIO archive specialists to anticipate the time when we will have to develop a retention/disposition plan of action.

- 4) Are the systems in the process using technologies in ways that the SBA has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?**

No, the Internet -- the HUBZone tool for basic service delivery -- has been used by the Agency in the past to collect similar information.

- 5) How does the use of this technology affect public/employee privacy?**

Not applicable, per above.

- 6) **Will this system in the process provided the capability to identify, locates, and monitor individuals? If yes, explain**

No, the system does not permit searches using personal identifiers.

- 7) **What kinds of information are collected as a function of the monitoring of individuals.**

None, see above.

- 8) **What controls will be used to prevent unauthorized monitoring?**

Not applicable, per above.

- 9) **Under which Privacy Act systems of records notice does the system operate? Provide number and name**

None

- 10) **If the system is being modified, will the Privacy Act Systems of records notice require amendment or revision? Explain.**

While the system (HCTS) will be upgraded this fiscal year, there is no functional change contemplated that will require any amendment or revision to the PIA records notice.

F ACCESS TO DATA:

- 1) **Who will have access to the data in the System? (e.g. contractors, users, managers, system administrators, developers, tribes, other)**

Access to the HUBZone Application Tracking System is limited to Federal employees of the HUBZone Program and the contractors hired specifically to review incoming files, and those contractors retained as HUBZone system developers

- 2) **How is access to the data by a user determined? Are criteria, procedures, controls and responsibilities regarding access documented?**

Levels of authorized access to the secure HUBZone database server are predetermined through role functions as defined in HUBZone Application Tracking System User's manual.

- 3) **Will users have access to all data on the system or will the user's access be restricted? Explain**

Access is limited by controlled assignment of a responsibility profile to all

users. Each responsibility comes with a pre-determined set of privileges, limiting data that may be viewed to data and reports that are within the duties and needs of the user.

- 4) **What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?**

Agency Security Roles and Procedures/Controls – Agency Security Access Procedures – Access is limited by controlled assignment of a responsibility profile to all users. Each responsibility comes with a pre-determined set of privileges, limiting data that may be viewed to data and reports that are within the duties and needs of the user. Education of Agency and contractor staff regarding the Privacy Act rules and prohibitions on the dissemination or use of non-public information is mandatory and ongoing. System audit trails can be used to document suspicious or irregular log-ons and navigation of the system. Agency network log-on procedures mandate a posted Privacy notice be viewed and acknowledged prior to entry.

- 5) **Are contractors involved with the design and development of the: system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?**

Yes. A Privacy Act clause is in the contract

- 6) **Do other systems share data or have access to the data in the system? If yes, explain.**

As noted previously, the online HUBZone certification system is designed to extract and auto-populate into the appropriate HUBZone application fields pre-existing data already supplied by the applicant and resident in two other Federal data collection systems, the DOD's Central Contractor Registration (CCR) and the nested SBA's Small Business Source System (SBSS). The system does not, however, transmit data to any other system, or share data with any other system.

- 7) **Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**

The Associate Administrator for the HUBZone Program is identified as the security officer.

- 8) **Will other agencies share data or have access to the data in this: system?**

No

- 9) **How will the data be used by the other agency?**

Not applicable, per above.

- 10) **Who is responsible for assuring proper use of the data?**

Not applicable, per above.

G. Privacy Impact Analysis

- 1) Discuss what privacy risks were identified and how they were mitigated for types of information collected.**

The privacy risks are minimized as each firm's senior official is sent a separate email and is asked to verify the information and whether the individual that submitted information on the firm's behalf was authorized to do so. The information collected is public information such as number of employees, revenues and a firm's location can be found in the public domain such as Central Contractor Register (CCR) or the Dynamic small Business Search (DSBS). In the event that any potentially sensitive data needs to be communicated to a firm, the information is generated and securely stored on the SBA's HUBZone servers. A generic email is sent to the firm notifying them that they have a correspondence waiting for them on the HUBZone system. The only way that the firm can view this correspondence is to log on to the HUBZone system through the SBA-provided General Login System (GLS) which follows and enforces all SBA Enterprise Architecture and Security Standards.

- 2) Describe any types of controls that may be in place to ensure that information is used as intent.**

The HUBZone Program offers help desk assistance to applications and firms to ensure that the procedures for entering, updating and retrieving information are adhered. The further security controls to protect the information from unauthorized access or use are pursuant to the SBA Enterprise Architecture and security standards under which this system currently falls. All system protections are pursuant to the security plan/controls already in place and mandated by SBA Enterprise Architecture. The HUBZone system, in conjunction with the SBA-provided General Login System (GLS), implements multiple user roles (Associate Administrator, System Administrator, Senior Program Analyst, Program Analyst, Operational Assistant, Primary Liaison Officer, and Applicant) that provides access control and restricts functionality as defined by the SBA. Furthermore, all personnel approved for internal SBA roles (all but the Applicant role) must first obtain Position of Public Trust clearances through IT Security.

3) Discuss what privacy risks were identified and how they were mitigated for information shared internal and external?

Internal and external individuals requesting access to HUBZone Tracking System must request access through IT Security. All system protections are pursuant to the security plan/controls already in place and mandated by the SBA Enterprise Architecture. The HUBZone tracking system is fully accredited system by the SBA Office of the Chief Information Officer. The HUBZone Certification Tracking System (HCTS) imports data from CCR and DSBS, but only data that is already publically available in other forums. Additionally, HCTS does not share its data with any other systems. The only access to HCTS data is through the SBA's General Login System which implements and enforces all of the SBA's Enterprise Architecture and Security Standards. Individual applicants are only allowed to view data specific to their firm. SBA personnel must be granted a Position of Public Trust clearance through IT Security prior to being granted access to the HCTS data. Furthermore, once approved to work on the HCTS, access is restricted based upon defined user roles which limits individuals to specific pre-approved functions and data.

4) What privacy risks were identified and describe how they were mitigated for security and access controls?)

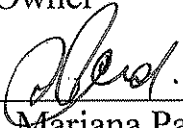
The HUBZone Tracking System follows the SBA Enterprise Architecture and Agency IT Security requirements as well as the Agency Security Access Procedures whereby access is limited and controlled by the assignment of roles associated with each user's profile. Each user's role is provided with a pre-determined set of privileges, limiting data that may be viewed, modified, or deleted. The HUBZone Program requires periodic training of the internal SBA staff, contractor regarding the Privacy Act Rule and prohibitions on the dissemination or use of non-public information. There are also system audit trails that can be utilized to document suspicious, irregular or unauthorized navigation of the system. The SBA agency network log on procedures mandate a posted Privacy Notice be viewed and acknowledged prior to entry into the system.

Privacy Assessment for HUBZone

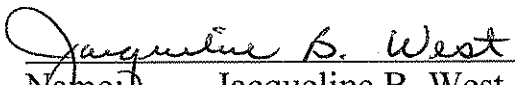
Responsible Officials - Approval Signature Page

The Following Officials Have Approved This Document

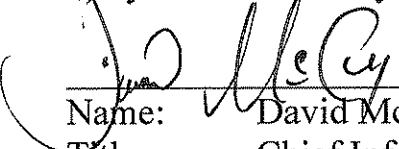
1) System Owner

 (Signature) 10/2/08 (Date)
Name: Mariana Pardo
Title: Acting Associate Administrator HUBZone Program

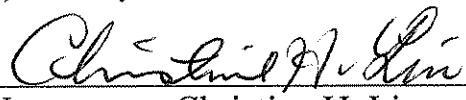
2) System Program/Project Manager

 (Signature) 10/2/08 (Date)
Name: Jacqueline B. West
Title: Acting HUBZone Program Manager West Coast

3) System IT Security Manager

 (Signature) 10/14/08 (Date)
Name: David McCauley
Title: Chief Information Security Officer

4) Privacy Official

 (Signature) 11/3/08 (Date)
Name: Christine H. Liu
Title: Chief Information Officer and Chief Privacy Officer,
SBA